

1 **ANDERSEN & BEEDE**

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12 *Counsel for Luis Flores*13 **UNITED STATES BANKRUPTCY COURT**14 **DISTRICT OF NEVADA**

15 In re:

16 CASH CLOUD, INC., dba COIN CLOUD

17 Debtor.

18 Case No.: 23-10423-mkn
Chapter 1119 **DECARATION OF RYAN A.
ANDERSEN IN SUPPORT OF LUIS
FLORES'S MOTION FOR RELIEF
FROM AUTOMATIC STAY
PURSUANT TO 11 U.S.C. § 362(d)**

20 Hearing Date: April 20, 2023

21 Hearing Time: 10:30 a.m.

22 I, Ryan A. Andersen, Esq. declare as follows:

23 1. I am over the age of 18 and mentally competent.

24 2. I make this declaration in support of Luis Flores's Motion for Relief from Automatic
Stay pursuant to 11 U.S.C. § 362(d) ("Stay Relief Motion").25 3. I am counsel for Mr. Luis Flores ("Mr. Flores"), a party in interest in the above-
captioned bankruptcy case.26 4. I have personal knowledge of the facts stated herein, and I could and would testify to
the same if called upon to do so.27 5. Through the Stay Relief Motion, Mr. Flores seeks entry of an order lifting or modifying
the automatic stay to permit issuance of a written decision following a bench trial conducted in the case

1 pending before the Eighth Judicial District Court in Clark County, Nevada ("State Court"), as case no.
2 A-19-807370-B ("State Court Action").

3 6. On March 13, 2023, in compliance with the Local Rule 4001(a)(2), the undersigned
4 counsel emailed Debtor's counsel, Brett Axelrod, Esq., regarding the resolution of the motion for stay
5 relief.

6 7. The parties agree that the Bankruptcy Court's order is necessary to allow the State Court
7 to issue its written decision in the State Court Action.

8 I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND
9 CORRECT.

10 Executed on this 15th day of March, 2023.

11 /s/ Ryan A. Andersen
12 Ryan A. Andersen, Esq.



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